

EXHIBIT 464

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

- - -

IN RE: NATIONAL	:	
PRESCRIPTION	:	MDL No. 2804
OPIATE LITIGATION	:	
	:	Case No.
	:	1:17-MD-2804
THIS DOCUMENT RELATES	:	
TO ALL CASES	:	Hon. Dan A. Polster

- - -

Thursday, January 3, 2019

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

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Videotaped deposition of JILL A. STRANG, held
at the offices of Cavitch, Familo & Durkin,
1300 East Ninth Street, Cleveland, Ohio, commencing at
8:57 a.m., on the above date, before Carol A. Kirk,
Registered Merit Reporter and Notary Public.

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<p style="text-align: right;">Page 314</p> <p>1 and I know what --</p> <p>2 A. Sorry.</p> <p>3 Q. -- you're doing, and it's okay.</p> <p>4 But we can go back and look at a document.</p> <p>5 Do you remember the document where</p> <p>6 they notified you guys that there was an order</p> <p>7 that was cut, it was reported to the DEA as</p> <p>8 suspicious, and it wasn't shipped, and then they</p> <p>9 said, "Maybe it was a fat finger," right?</p> <p>10 A. Correct.</p> <p>11 Q. So they already reported it to the</p> <p>12 DEA before they asked whether it was a fat</p> <p>13 finger, right?</p> <p>14 A. They cut it.</p> <p>15 Q. Yeah. But you -- if it had been</p> <p>16 you, there wouldn't have been a threshold. You</p> <p>17 would have looked at it, and then you would have</p> <p>18 done some diligence, due diligence, and then</p> <p>19 you -- well, you didn't, because you never</p> <p>20 did -- you would not have reported that to the</p> <p>21 DEA, right?</p> <p>22 A. I did do my due diligence.</p> <p>23 Q. But you didn't ever report</p> <p>24 anything to the DEA?</p>	<p style="text-align: right;">Page 316</p> <p>1 your question.</p> <p>2 Q. Okay. That fat finger one that</p> <p>3 they cut, would you have reported that to the</p> <p>4 DEA?</p> <p>5 A. No, because it would --</p> <p>6 MR. JOHNSON: Objection.</p> <p>7 But go ahead.</p> <p>8 A. No, because it wouldn't -- when it</p> <p>9 came over, it would have been investigated and</p> <p>10 looked at --</p> <p>11 Q. Right.</p> <p>12 A. -- and stopped before it left the</p> <p>13 distribution center.</p> <p>14 Q. Right.</p> <p>15 A. They just automatically cut.</p> <p>16 Q. But they didn't send it either,</p> <p>17 did they?</p> <p>18 A. They automatically cut it. They</p> <p>19 didn't even ask any questions.</p> <p>20 Q. Right. So they cut it, didn't</p> <p>21 ship it, and reported it. You would have</p> <p>22 called, stopped it, but not reported it, fair?</p> <p>23 A. Fair, as an order, yes.</p> <p>24 Q. And you -- because you've never</p>
<p style="text-align: right;">Page 315</p> <p>1 A. I did not.</p> <p>2 Q. Okay. You would identify the fat</p> <p>3 finger situation, fix it or resolve it, work it</p> <p>4 out, but it wouldn't get reported; whereas</p> <p>5 Cardinal reports it, and then after the fact,</p> <p>6 you've got to go and figure out what happened,</p> <p>7 right?</p> <p>8 A. Yes. Probably because, again, we</p> <p>9 know our customers. So our customers are the</p> <p>10 stores, and I'm -- I'm not going to look at it</p> <p>11 as -- I'm going to look at it as "Let's fix</p> <p>12 this" because it was wrong when it came over.</p> <p>13 Q. Okay. And so I'm going back to my</p> <p>14 question I asked you before, which is you would</p> <p>15 agree, based on these documents, that Cardinal's</p> <p>16 reporting system to the DEA was more sensitive</p> <p>17 than DDM's in that they would report more stuff</p> <p>18 than you would?</p> <p>19 MR. JOHNSON: Objection.</p> <p>20 A. They see way more orders than I</p> <p>21 do.</p> <p>22 Q. That's not an answer to my</p> <p>23 question.</p> <p>24 A. But I don't know how to answer</p>	<p style="text-align: right;">Page 317</p> <p>1 reported a single suspicious order to the DEA</p> <p>2 ever, right?</p> <p>3 A. Correct.</p> <p>4 MR. MULLIGAN: Okay. No further</p> <p>5 questions.</p> <p>6 THE VIDEOGRAPHER: The time is now</p> <p>7 2:55. This concludes the deposition.</p> <p>8 Going off the record.</p> <p>9 (Signature not waived.)</p> <p>10 ---</p> <p>11 Thereupon, at 2:55 p.m., on Thursday,</p> <p>12 January 3, 2019, the deposition was concluded.</p> <p>13 ---</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>